

## INTEGRATED ACCESSIBILITY STANDARDS POLICY

## Purpose

The following policy has been established by Brock Solutions Inc. to govern the provision of services with Regulation 191/11, "Integrated Accessibility Standards" ("Regulation") under the Accessibility for Ontarians with Disabilities Act, 2005.

These standards are developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment.

Brock Solutions Inc. is governed by this policy as well as the Accessibility Standards for Customer Service Policy and the *Accessibility for Ontarians with Disabilities Act, 2005* in meeting the accessibility needs of persons with disabilities.

#### Commitment

Brock Solutions Inc. is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of persons with disabilities in a timely and reasonable manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements, where reasonable, under the Accessibility for Ontarians with Disabilities Act.

This policy will be implemented in accordance with the time frames established by the Regulation.

## Definitions

"Accessible Format" may include but not limited to: large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities

"Accommodation" means the special arrangements made or assistance provided so that customers with disabilities can participate in the experiences available to customers

**"Communication Support"** may include but not limited to: captioning, alternative and augmentative communication support, sign language and other supports that facilitate effective communications

#### "Disability" is:

- Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect, illness, and without limiting the generality of the foregoing, includes diabetes, epilepsy, brain injuries, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impairment, deafness or hearing impediment, blindness or visual impediment, or physical reliance on a service animal or other remedial appliance or device;
- A condition of mental impairment or a developmental disability.
- A learning disability or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language.
- A mental disorder;
- An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

"Service Animal" is an animal that has been trained to assist a person who has a disability



"**Support Person**" means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs or with access to goods, services or facilities.

## Accessibility Plan

Brock Solutions Inc. will develop, maintain and document an Accessibility Plan outlining the company's strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities.

The Accessibility Plan will be reviewed and updated at least once every five years, and will be posted on the company's website. Upon request, Brock Solutions Inc. will provide a copy of the Accessibility Plan in an accessible format.

## **Training Employees and Volunteers**

Brock Solutions Inc. will ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation and continue to provide training on the *Human Rights Code* as it pertains to persons with disabilities, to:

- all its employees and volunteers;
- all persons who participate in developing Brock Solutions Inc.'s policies; and,
- all other persons who provide goods, services or facilities on behalf of the company

The training will be appropriate to the duties of the employees, volunteers and other persons.

Employees will be trained when changes are made to the accessibility policy. New employees will be trained during the new hire orientation process or as soon as practicable.

Brock Solutions Inc. will maintain a record of the dates of when training is provided and the names of individuals to whom it was provided.

Brock Solutions Inc will provide staff with training that includes:

- A review of the purposes of the Accessibility for Ontarians with Disabilities Act, 2005
- How to interact and communicate with persons with various types of disabilities
- How to interact with persons with disabilities who use an assistive device or require the assistance of a service animal or support person

## INFORMATION AND COMMUNICATIONS STANDARDS

## Feedback

Brock Solutions Inc. will continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request.



## Accessible Formats and Communication Supports

Upon request, Brock Solutions Inc. will provide, or will arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability.

Brock Solutions Inc. will consult with the person making the request in determining the suitability of an accessible format or communication support.

Brock Solutions Inc. will also notify the public about the availability of accessible formats and communication supports.

#### **Accessible Websites and Web Content**

Brock Solutions Inc. will ensure that our Internet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.1, at Level AA except where this is not practicable.

## **EMPLOYMENT STANDARDS**

#### Recruitment

Brock Solutions Inc. will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

#### **Recruitment, Assessment or Selection Process**

Brock Solutions Inc. plans to notify job applicants, when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request in relation to the materials or processes used.

If a selected applicant requests an accommodation, Brock Solutions Inc. plans to consult with the applicant, having regard for the applicant's accessibility needs, on the provision of a suitable accommodation.

## **Notice to Successful Applicants**

When making offers of employment, Brock Solutions Inc. plans to notify the successful applicant of its policies for accommodating employees with disabilities.

## Informing Employees of Supports

Brock Solutions Inc. will continue to inform its employees of its policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing employment.

## Accessible Formats and Communication Supports for Employees



Upon the request of an employee with a disability, Brock Solutions Inc. will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other employees. In determining the suitability of an accessible format or communication support, Brock Solutions Inc. will consult with the employee making the request.

## Workplace Emergency Response Information

Brock Solutions Inc. will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if Brock Solutions Inc. is aware of the need for accommodation due to the employee's disability. Brock Solutions Inc. will provide this information as soon as practicable after becoming aware of the need for accommodation.

Where the employee requires assistance, Brock Solutions Inc. will, with the consent of the employee, provide the workplace emergency response information to the person designated by Brock Solutions Inc. to provide assistance to the employee.

Brock Solutions Inc. will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodations needs or plans are reviewed.

## **Documented Individual Accommodation Plans**

Brock Solutions Inc. will maintain a written process for the development of documented individual accommodation plans for employees with disabilities.

If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans.

In addition, the plans will include individualized workplace emergency response information (where required), and will identify any other accommodation that is to be provided.

#### **Return to Work Process**

Brock Solutions Inc. maintains a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

The return-to-work process outlines the steps Brock Solutions Inc. will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

This return-to-work process will not replace or override any other return to work process created by or under any other statute (i.e.., the *Workplace Safety Insurance Act, 1997*).

# Performance Management, Career Development and Advancement & Redeployment

Brock Solutions Inc. will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.



## CUSTOMER SERVICE STANDARDS

#### Communication

Brock Solutions Inc. will communicate with persons with disabilities in ways that take into account their disabilities, in person, in writing, by electronic mail, telephone and through relay services.

#### **Assistive Devices**

Brock Solutions Inc. is committed to serving persons with disabilities who use assistive devices to access our programs, services and premises.

#### **Use of Service Animals**

Persons with disabilities may bring their service animal on premises that are open to the public or other third parties. Brock Solutions Inc. will ensure staff, volunteers and third parties dealing with the public are trained on how to interact with persons with disabilities who are accompanied by a service animal.

#### Use of Support Persons

Any person with a disability who is accompanied by a support person will be allowed to enter our premises that are open to the public or other third parties with his or her support person. At no time will a person with a disability who is accompanied by a support person will be prevented from having access to his or her support person while on our premises.

## Notice of Temporary Disruption

Brock Solutions Inc. will provide the public with notice in the event of a planned or unexpected disruption in the facilities or services used by persons with disabilities.

This notice will include the following information:

- The reason for the disruption
- How long the disruption is expected to last
- Description of alternative facilities or services, if available.

The notice will be placed at all entrances and at reception. Depending on the nature of the disruption, notice will also be provided on our website and through a telephone call or written email.

#### Questions about this policy

This policy has been developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment. Please direct any questions or feedback about this policy, or requests for copies of this policy to:

#### The Human Resources Team

askhr@brocksolutions.com